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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOSEPH D. LENTO, ESQ., et al.,

Plaintiffs,

v.

KEITH ALTMAN, ESQ., et al,

Defendants.

Civil Action No.: 1:22-cv-04840

AFFIDAVIT OF GARY A. DAY

***DOCUMENT FILED
ELECTRONICALLY***

I, **GARY A. DAY**, state the following of my own personal knowledge:

1. I am employed by the Law Office of Keith Altman as the Director of Operations and IT specialist.

2. I have been working diligently to compile all electronically stored information requested by Plaintiffs that Defendants are to produce per this Court's Orders.

3. As it pertains to the data stored in the Law Office of Keith Altman's ("KAL") Clio account concerning the shared student defense cases, that information has proved too voluminous to extract to another platform in which Plaintiffs would be able to freely view those electronic materials. The only reasonable means for Plaintiffs to view this stored

information would be via purchasing their own Clio license or performing an in-person review of the materials with Defendants' counsel present.

4. Plaintiffs provided 250 lines of search criteria. *See Exhibit A.*

5. The software is able to run 20 lines of search criteria at a time.

6. I have been able to run preliminary searches for all emails and other messages requested by Plaintiffs and that Defendants have been ordered to produce per this Court's Orders.

7. There is a total of approximately 200,000 written communications sought.

8. Due to the voluminosity of written communications received by Mr. Altman, his inbox was archived on August 17, 2022.

9. Prior to that, Mr. Altman's written communications had been archived May 30, 2021.

10. In order to search the archived data, additional software tools are required and will incur additional time in compiling the communications sought.

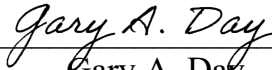
11. The configuration of our software embeds all Microsoft Teams messages into each employee's inbox.

12. There is not a way to extract all Microsoft Teams messages in one operation, creating a significant burden on production.

13. An individual review of each of these emails would be unduly burdensome to accomplish as it would require Defendants to hire additional staffing, work many hours of overtime and acquire additional resources to assist in the process.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed this 21st day of March 2024.



Gary A. Day

EXHIBIT A

Search Terms

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